

EXHIBIT 39

In the Matter Of:
Fair Fight vs Raffensperger

30(b)(6) Matthew Laney

October 23, 2019



3200 COBB GALLERIA PARKWAY
SUITE 265
ATLANTA, GA 30339

1 MR. KASTORF: -- objection to form.

2 MR. DENTON: Yeah, I just didn't --
3 okay. Okay.

4 BY MR. DENTON:

5 Q. You can answer the question if you --

6 MR. DENTON: Would you mind reading
7 it back?

8 (Whereupon, the record was read by
9 the court reporter as follows:

10 Q "Do you believe defendants
11 intended to discriminate against voters
12 on the basis of race?")

13 THE WITNESS: I believe I already
14 answered that question. I -- it's
15 impossible for me to know what anyone's
16 intentions are.

17 But I think the actions are certainly
18 in line with Georgia's history of
19 discrimination and frustrating voters
20 getting to the polls, particularly among
21 communities of color.

22 BY MR. DENTON:

23 Q. Have you provided documents to the
24 Internal Revenue Service describing the purpose of
25 the church?